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The Honorable Tana Lin

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

KATHELEEN MORIARTY,)	
)	No. 2:23-CV-1209-TL
Plaintiff,)	
v.)	
PORT OF SEATTLE,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE TRIAL AND
)	SCHEDULING ORDER
<u>Defendant.</u>)	

STIPULATION

IT IS STIPULATED by and between Corbin O. Earl and Jonathan Edwards, of Earl and Edwards PLLC, counsel for Plaintiff, and Molly Gibbons and Shannon Phillips of Summit Law Group, PLLC, counsel for Defendant, that the current trial date of November 18, 2024, should be stricken, setting the trial in this matter to a date amenable to the Court and issuing an amended Scheduling Order providing a 60-day extension for rebuttal expert disclosures and resetting the unexpired pre-trial deadlines. The basis for the trial continuance is that Plaintiff's counsel has just been retained by the formerly *pro se* litigant and needs to be able to review the case in order to complete discovery and be prepared for any dispositive or expert motions. As both parties were diligent in attempting to meet the previous deadlines, there is good cause to modify the case schedule and continue the trial.



1 The Parties have stipulated, and ask, that a Jury Demand also be allowed to be filed.

2 We understand that the Court does not have availability until September 2025. Plaintiff's
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4 counsel will be unavailable from November 4-17, 2025. Defendant's counsel does not have any
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6 unavailable dates after September 1, 2025.

7 DATED this 27th day of June, 2024.

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9 EARL AND EDWARDS, PLLC

SUMMIT LAW GROUP, PLLC

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12 /s/ Corbin O. Earl
13 CORBIN O. EARL, WSBA #52300
14 JONATHAN EDWARDS, WSBA#53589

/s/ Molly Gibbons
MOLLY GIBBONS, WSBA#58357
SHANNON PHILLIPS, WSBA#25631



[PROPOSED ORDER]

THIS MATTER came before the above-entitled Court upon stipulation of counsel, the Court having examined the records and being fully advised in the matter, it is now

ORDERED that the trial of the above-entitled cause, currently scheduled for November 18, 2024, shall be stricken. This matter shall be set for trial on a date amenable to the Court, excluding November 4-17, 2025, and an amended case scheduling order, extending the rebuttal expert disclosure deadline by 60-days and resetting the unexpired pre-trial deadlines, shall be entered. Plaintiff is permitted to file a Jury Demand.

DATED this 27th day of June, 2024.


JUDGE TANA LIN

